

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MARC ELLIOT,

Plaintiff,

v.

Case No. 4:23-cv-01611-SEP

HBO HOME ENTERTAINMENT CORP., a  
Delaware Corporation; JEHANE  
NOUJAIME, an individual; KARIM AMER,  
an individual; THE OTHRS, LLC, a Florida  
limited liability company; THE OTHRS  
LICENSING CORP., a Florida corporation;  
THE SQUARE, LLC, a New York limited  
liability company; ISABELLA  
CONSTANTINO, an individual; JOHN  
DOES 1–10,

Defendants.

**DECLARATION OF JEHANE NOUJAIM**

I, Jehane Noujaim, hereby declare, under penalty of perjury, as follows:

1. I am a filmmaker and producer domiciled in New York. I am currently located in Cairo, Egypt.
2. I respectfully submit this declaration in support of Defendants' motion to dismiss for lack of personal jurisdiction pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure and for improper venue pursuant to Rule 12(b)(3). The statements in this declaration are based on my personal knowledge.

3. I have not been served with the summons and Complaint in this action. By submitting this declaration I do not intend to waive service or concede that jurisdiction and venue are proper.

4. Karim Amer and I are the sole members of The Othrs, LLC, a production company that was formed in Florida and has its principal place of business in New York.

5. The Square, LLC is a production company that was formed in New York and has its principal place of business in New York. Its sole member is Noujaim Films, Inc., which was incorporated in New York and has its principal place of business in New York.

6. The Othrs, LLC and The Square, LLC are two of the companies responsible for producing the documentary series *The Vow*, which I co-directed with Karim Amer.

7. The Othrs, LLC, The Square, LLC, and Noujaim Films, Inc. have no offices, real estate, or employees in Missouri.

8. The Othrs, LLC, The Square, LLC, and Noujaim Films, Inc. do not do any business in Missouri.

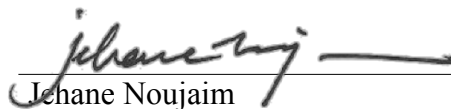
9. I have never been to Missouri.

10. I do not know whether Marc Elliot lived in Missouri during the production of *The Vow*. If he did, I was not aware of it.

11. To my knowledge, I had no dealings with any people or entities in Missouri in connection with producing or directing *The Vow*.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Executed: January 12, 2024

  
Jehane Noujaim